

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
SOUTHERN DIVISION**

**UNITED STATES OF AMERICA,**

Plaintiff,

v.

**KEVIN LEVON BONNER,**

Defendant.

**No. 20-mj-2038DPR**

**UNITED STATES' MOTION FOR PRETRIAL DETENTION AND FOR  
A HEARING PURSUANT TO 18 U.S.C. § 3142(f)**

The United States of America, through Timothy A. Garrison, United States Attorney for the Western District of Missouri, and by the undersigned Assistant United States Attorney requests pretrial detention and a detention hearing pursuant to 18 U.S.C. § 3142 (f)(1)(A), (f)(2)(A) and (f)(2)(B). At this hearing, the evidence will demonstrate that no condition or combination of conditions of release will reasonably assure the defendant's appearance as required by the Court and the safety of other persons and the community.

**Supporting Suggestions**

1. 18 U.S.C. § 3142(f)(1)(A) provides that a hearing must be held by the appropriate judicial officer to determine whether any condition or combination of conditions will reasonably assure the defendant's appearance and the safety of any other person in the community if the attorney for the Government moves for such a hearing and if the case is one that involves a crime of violence as defined in 18 U.S.C. § 3156(a)(4)(A), which includes assault of a spouse, intimate partner, or dating partner by strangling, suffocating, or

attempting to strangle or suffocate on the territorial jurisdiction of the United States, in violation of 18 U.S.C. § 113(a)(8).

2. The statute recognizes two additional situations which allow for a detention hearing and which can be raised either by the attorney for the Government or by a judicial officer.

These conditions are:

- a. When there is a serious risk that the defendant will flee; or,
  - b. When there is a serious risk that the person will "obstruct or attempt to obstruct justice, or threaten, injure, or intimidate, or attempt to threaten, injure, or intimidate, a prospective witness or juror." 18 U.S.C. § 3142(f)(2)(A) and (B).
3. One or more grounds for pretrial detention and a pretrial detention hearing as set forth by the statute exists in the above cause, to wit: this matter involves crimes of violence as defined in 18 U.S.C. § 3156(a)(4)(A), which includes assault of a spouse, intimate partner, or dating partner by strangling, suffocating, or attempting to strangle or suffocate on the territorial jurisdiction of the United States, in violation of 18 U.S.C. § 113(a)(8); and there is a serious risk that the defendant's release will present a substantial risk to the community.
4. Moreover, the nature and circumstances of the charged offenses, the weight of the evidence, the defendant's history and characteristics, and the nature and seriousness of the danger to any person or the community that would be posed by the defendant's release, each demonstrate that there is no condition or combination of conditions set forth in 18 U.S.C. § 3142(c) that will reasonably assure the appearance of the defendant as required and the safety of other persons and the community.

5. The Government is aware of the following evidence:
- a. In relation to the nature and circumstances of the offenses charged, the defendant assaulted his wife, S.B., by strangulation.
  - b. In relation to the weight of the evidence supporting the charges in the complaint, the affidavit in support of the complaint details the nature of the assault on S.B. As a consequence of the assault, S.B. suffered a bilateral blowout fracture to her eyes, fractures of both orbital socket bones in the face.
  - c. In relation to the history and characteristics of the defendant, the defendant committed the instant offense while on parole for Felonious Restraint and Unlawful Use of a Weapon in Boone County Circuit Court case number 16BA-CR00805-01. The defendant's convictions stemmed from an assault on his wife, C.B. C.B. had temporarily relocated to a domestic violence shelter in Columbia, Missouri; however, she went back home after the defendant contacted her. After arriving at their residence, the defendant grabbed a FMK handgun and told C.B. to get into their car, while their four children, ages one to six, were left alone in the apartment. While in the vehicle, the defendant put the barrel of the handgun to C.B.'s head, told C.B. he knew she had lied, and stated he was going to kill C.B. While driving, the defendant fired two rounds into the air through the vehicle's open sunroof. C.B. reported multiple prior incidents of domestic abuse including an occasion on which the defendant had strangled her and only stopped after she popped a blood vessel in her eye.

**WHEREFORE**, the United States requests a pretrial detention hearing and that the defendant be detained pending trial.

Respectfully submitted,

Timothy A. Garrison  
United States Attorney

By /s/ Ami Harshad Miller  
Ami Harshad Miller  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing was delivered on July 16, 2020, to the CM-ECF system of the United States District Court for the Western District of Missouri for electronic delivery to all counsel of record.

/s/ Ami Harshad Miller  
Ami Harshad Miller  
Assistant United States Attorney